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UNITED STATES EASTERN DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

LAURA SANTOYO,
 	
                    Plaintiff,
 	
          v.
 	
RICH PRODUCTS CORPORATION, a California Corporation, and DOES 1 – 10, inclusive,
 	
                    Defendants.
	Case No.: 2:24-cv-1856-JDP
	
	JOINT STIPULATION FOR EXTENDING DEADLINES AND PROPOSED ORDER
	
	Complaint Filed: May 24, 2024

Gavrilov & Brooks
2315 Capitol Avenue
Sacramento, CA 95816

LAURA SANTOYO ("Plaintiff") and RICH PRODUCTS CORPORATION ("Defendant") (collectively, "the Parties"), by and through their undersigned counsel, hereby stipulate and agree as follows:

WHEREAS, the Court's Initial Pretrial Scheduling Order (DKT 20) includes the following deadlines:

- Initial expert disclosure deadline: June 5, 2025

- Rebuttal expert disclosure deadline: June 26, 2025

- Deadline for hearing motions to compel discovery: July 17, 2025

- Deadline for the Parties to complete discovery: August 7, 2025

- Deadline for hearing dispositive motions: October 9, 2025;

WHEREAS, the Parties are re-engaging in settlement discussions and agree that efforts to informally resolve the above-captioned Action will be better served if the above-mentioned deadlines are vacated and continued by thirty days;

WHEREAS, the Parties agree and stipulate that continuing the above-mentioned deadlines by 30 days (with the deadline falling on the next Court Day if the 30th day falls on a Saturday or Sunday), as requested by this stipulation, would cause fair, efficient and just administration of the Action;

WHEREAS the Parties have not requested any continuances at any former time;

WHEREAS, the Parties agree and stipulate that no Parties will be prejudiced by the requested relief;

IT IS HEREBY STIPULATED AND AGREED BY THE PARTIES HERETO, THROUGH THEIR RESPECTIVE COUNSEL, THAT THE INITIAL EXPERT DISCLOSURE DEADLINE; REBUTTAL EXPERT DISCLOSURE DEADLINE; DEADLINE FOR HEARING MOTIONS TO COMPEL DISCOVERY; DEADLINE FOR THE PARTIES TO COMPLETE DISCOVERY; AND DEADLINE FOR HEARING DISPOSITIVE MOTIONS SHALL BE CONTINUED BY THIRTY DAYS.

JOINT STIPULATION FOR EXTENDING DEADLINES AND ~~PROPOSED~~ ORDER

IT IS SO STIPULATED.

Dated: **GAVRILOV & BROOKS**

By: _____
J. Edward Brooks
Alexandra Darling
Attorneys for Plaintiff
LAURA SANTOYO

Dated: **HIRSCHFELD KRAEMER**

By: _____
Monte Grix
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JOINT STIPULATION FOR EXTENDING DEADLINES AND ~~PROPOSED~~ ORDER

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[PROPOSED] ORDER

Based upon the foregoing stipulation of the Parties, and good cause appearing therefor,

IT IS HEREBY ORDERED AS FOLLOWS:

The Parties' initial expert disclosure deadline of June 5, 2025 is hereby vacated, with a new deadline of **July 7, 2025**.

The Parties' rebuttal disclosure deadline of June 26, 2025 is hereby vacated, with a new deadline of **July 28, 2025**.

The deadline of July 17, 2025 for the Parties to have motions to compel discovery heard is hereby vacated, with a new deadline of **August 21, 2025**.

The deadline of August 7, 2025 for the Parties to complete discovery is hereby vacated, with a new deadline of **September 8, 2025**.

The deadline of October 9, 2025 for the Parties to have dispositive motions heard is hereby vacated, with a new deadline of **November 13, 2025**.

Aside from these new deadlines, the Court's Initial Pretrial Scheduling Order (DKT 20) remains unaffected.

IT IS SO ORDERED.

Dated: May 29, 2025

_____

JEREMY D. PETERSON
UNITED STATES MAGISTRATE JUDGE

JOINT STIPULATION FOR EXTENDING DEADLINES AND ~~PROPOSED~~ ORDER